



CERCLA

National Priorities List 101

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What is the NPL?

- List of national cleanup priorities among the known releases of threatened releases of hazardous substances, pollutants, or contaminants throughout the U.S. –NCP
- There are about 1,300 sites on the NPL nationwide, 130 of which are mining sites.
- To get added to the NPL, a site must be scored with the Hazard Ranking System (HRS) and the score must be > 28.50 out of 100



CERCLA and the Hazard Ranking System

- The CERCLA (Superfund) program was created to identify, and, if necessary, remediate releases of hazardous substances that pose a significant threat to human health and the environment.
- Placement of a site on the National Priorities List makes the site eligible for federal funding for possible site remediation.
- Within the Superfund program, the HRS is the main mechanism for identifying releases at sites that may warrant further investigation and possible remediation.
- The role of the Hazard Ranking System is as an initial screening tool. **It is not a site specific risk assessment.**

Once a site HRS scoring package is prepared, EPA will use it to propose that a site be included on the National Priorities List. HRS documentation package includes the documentation record and references. And it contains the source descriptions and pathways evaluated along with the score.



Hazard Ranking System

- A mathematical model that evaluates 4 different pathways: groundwater, surface water, soil exposure, air
- Used as a screening tool
 - » At the Preliminary Assessment stage (and beyond), a HRS score is generated before field activities begin, to help prioritize resources used for sampling events
 - » Sites with a score of 28.50 or greater qualify for further assessment under CERCLA
 - » Max score 100

HRS provides criteria for EPA to use when assessing sites. MUCH more efficient than conducting RI level of investigation at every site!

Root mean square formula to produce score from 0-100.



How does a site get onto the National Priorities List?

- ◆ EPA seeks concurrence from the State
- ◆ EPA proposes the site to the National Priorities List by announcing in the Federal Register.
- ◆ There is a formal 60 day public comment period after the Site is proposed.
- ◆ EPA addresses each comment received.
- ◆ A second announcement is required to finalize the site on the NPL. At that time EPA publishes a "Response to Comments" document.

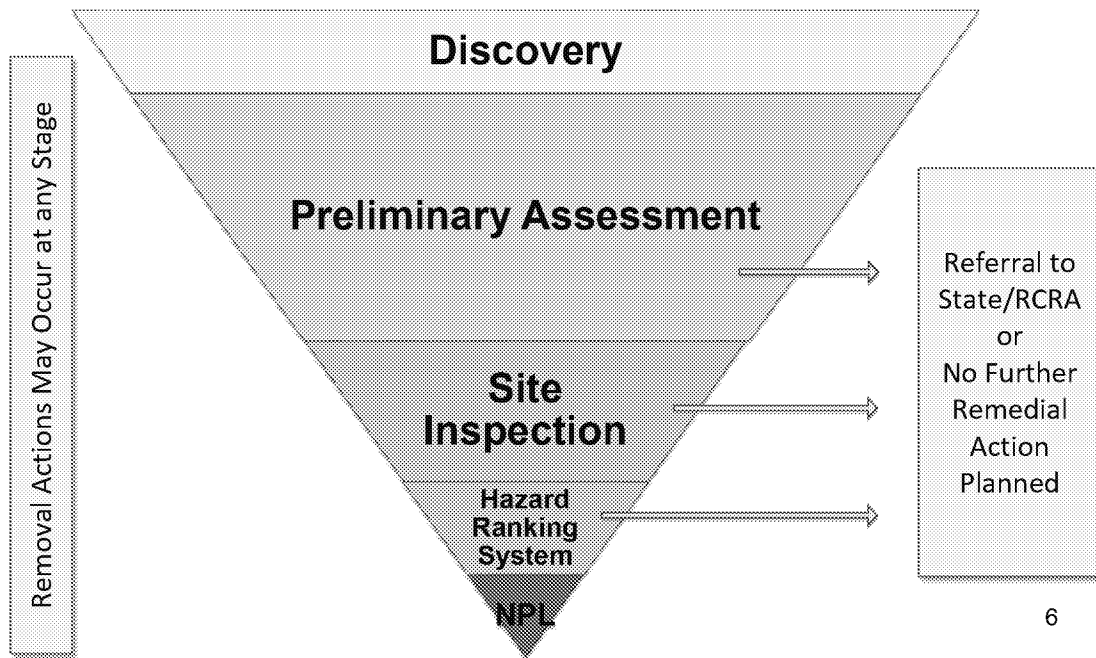
Other ways to get onto the NPL:

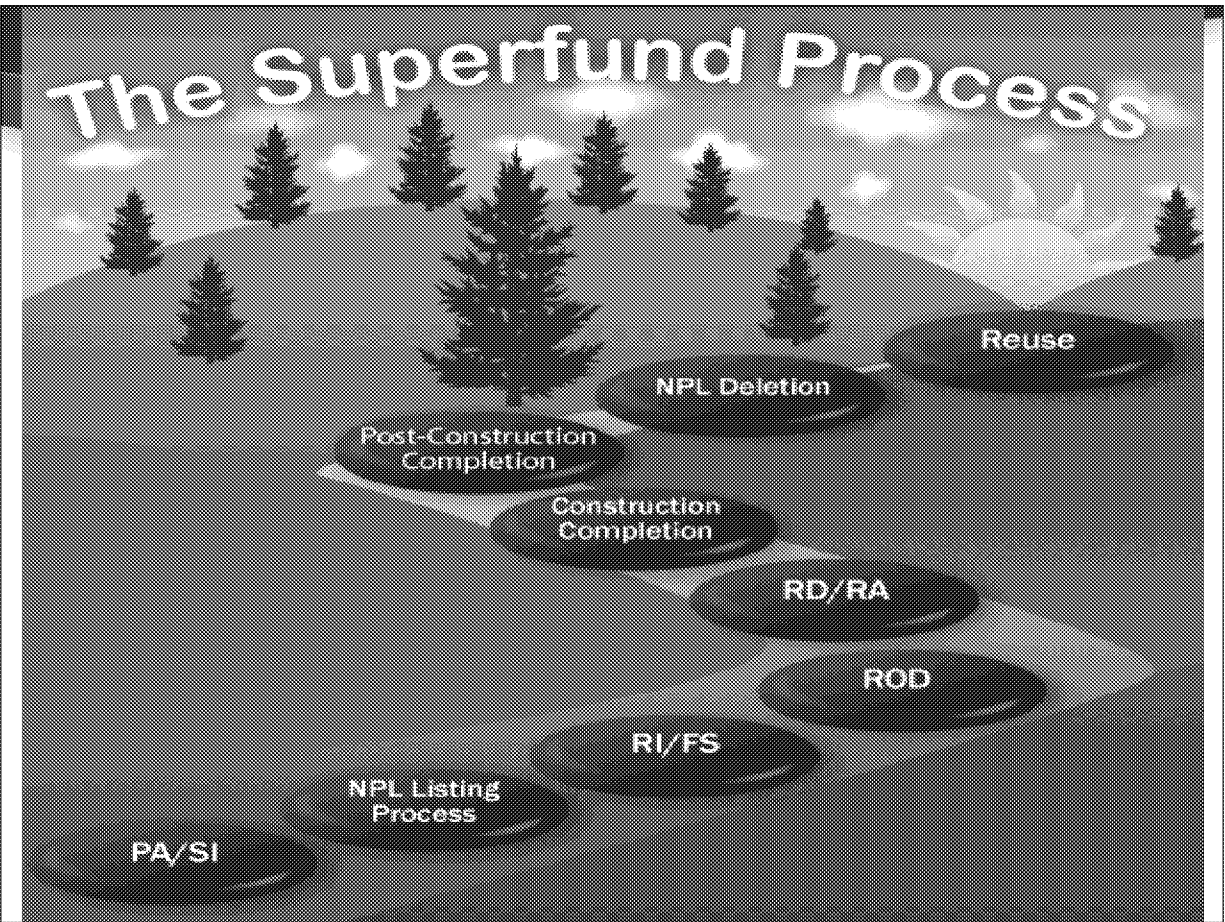
State Pick

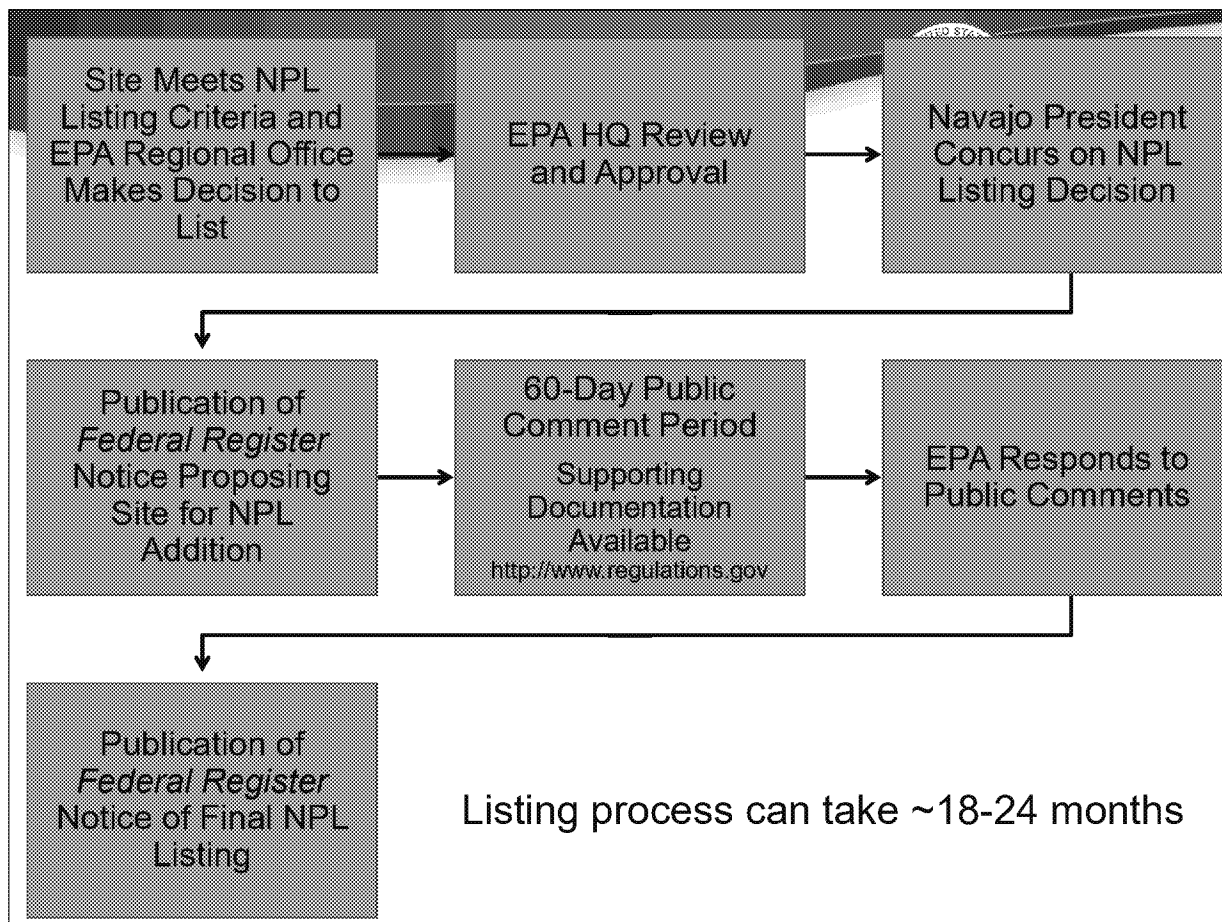
ATSDR declares area uninhabitable AND removal is too costly



Site Assessment Process







Once a site HRS scoring package is prepared, EPA will use it to propose that a site be included on the National Priorities List
HRS documentation package includes the documentation record and references
And it contains the source descriptions and pathways evaluated along with the score



Why the NPL?

- DTSC has taken action to mitigate risks at/around the former Exide facility; however, the Site will require long term remedial action
- The addition of Exide to the NPL would provide access to federal funding for the cleanup and enables the EPA to begin identifying responsible parties to fund remediation

Site is in close proximity to sensitive receptors (school children).



What is a “Site?”

- Areas where any hazardous substance has been deposited, stored, disposed, or placed
- Includes the “source” of contamination and where the contamination ends up
- Examples may include a ground water plume or contaminated soils with no identifiable source



Contaminants & Pathways

- Soil exposure is the primary pathway; surface water also scored.
- Primary contaminant is lead

Ex. 5 Deliberative Process (DP)